



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

January 8, 2025

VIA ECF

Honorable Jessica G.L. Clarke
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Keisha-Ann G. Gray
Member of the Firm
212.969.3855
kgray@proskauer.com
www.proskauer.com

MEMO ENDORSED

Re: *Topaz Smith v. World Economic Forum, et al.*, 24-cv-05150 (Clarke, J.)

Dear Judge Clarke:

We represent Defendants World Economic Forum, World Economic Forum LLC, and Klaus Schwab in the above-referenced matter. Pursuant to Section 2(e) of Your Honor's Individual Rules and Practices in Civil Cases, Defendant Schwab respectfully requests that the Court extend his deadline for filing a Reply Memorandum of Law in Further Support of his Motion to Dismiss the Amended Complaint from January 17, 2025, until February 17, 2025. This is Schwab's first request to extend the reply deadline, and is made to provide sufficient time to prepare his submission. Plaintiff consents to this application.

If granted, this request, made on consent, will not affect any of the dates set forth in the Civil Case Management Plan and Scheduling Order dated January 6, 2025. Dkt. No. 38. Pursuant to that Order, the parties' next scheduled court appearance is a case management conference scheduled for 11:00 a.m. on May 21, 2025.

Defendant thanks the Court for its consideration of this request.

Application GRANTED. Reply due **February 17, 2025**.
The Clerk of Court is directed to terminate ECF No. 39.

SO ORDERED.

JESSICA G. L. CLARKE
United States District Judge

Dated: January 9, 2025
New York, New York

Respectfully submitted,

/s/

Keisha-Ann G. Gray
Evandro C. Gigante
Melanie M. Speight
Proskauer Rose LLP
Counsel for Defendants
Eleven Times Square
New York, NY 10036
(T) 212-969-3000
kgray@proskauer.com
egigante@proskauer.com
mspeight@proskauer.com

cc: via ECF



Honorable Jessica G.L. Clarke
January 8, 2025
Page 2

Valdi Licul
John S. Crain
Wigdor LLP
Counsel for Plaintiff
85 Fifth Avenue, Fifth Floor
New York, NY 10003
(212) 257-6800
jcrain@wigdorlaw.com
vlicul@wigdorlaw.com